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ATTORNEYS AT LAW

9 May 2002

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Notice of Ex Parte Communications, ET Docket No. 99-231

Dear Ms. Dortch:

On 8 and 9 May 2002, undersigned counsel, representing the Bluetooth SIG, discussed certain issues in the above-noted proceeding with: (a) Peter Tenhula, senior legal advisor to Chairman Powell, (b) Bryan Tramont, senior legal advisor to Commissioner Abernathy, (c) Sam Feder, legal advisor to Commissioner Martin, and (d) Maureen McLaughlin of the Office of the General Counsel.

Specifically, counsel urged the Commission to adopt its proposal permitting reduced hopsets for FHSS devices in the 2.4 GHz band *and* to mandate that devices taking advantage of such reduced hopsets use adaptive hopping algorithms. The adoption of these rule changes will permit increased use of the 2.4 GHz band with even fewer interference concerns than exist today.

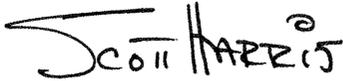
Counsel noted that the whole purpose of permitting reduced hopsets is to enable adaptive hopping techniques. It is the *combination* of reduced hopsets and adaptive hopping techniques that will improve the interference environment in the 2.4 MHz unlicensed band. Thus, if the Commission's goal is to improve the interference environment in the 2.4 MHz unlicensed band as fully as possible, it should mandate the use of adaptive hopping algorithms by those devices utilizing reduced hopsets.

Counsel also argued that simply reducing permitted power levels for devices using reduced hopsets would not be sufficient to allow industry and consumers to benefit fully from a reduced interference environment.

Marlene Dortch, Secretary
9 May 2002
Page 2

Finally, Counsel suggested that the Commission should take this opportunity to permit coordinated hopping between RF transmitters contained within a single device (such as a laptop) -- or to make clear that coordinated hopping between RF transmitters contained within a single device is permitted under current rules.

Respectfully submitted,

A handwritten signature in black ink that reads "SCOTT HARRIS". The signature is stylized with a large, sweeping initial "S" and a small circle above the "I" in "HARRIS".

Scott Blake Harris

cc: Peter Tenhula
Bryan Tramont
Sam Feder
Maureen McLaughlin